## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA NORFOLK DIVISION

ADAM KEY,	
Plaintiff, )	
<b>v.</b>	CASE NO.: 2:08CV174
REGENT UNIVERSITY, et al.	
Defendants. )	

## **DEFENDANTS' MOTION FOR ATTORNEYS' FEES AND/OR SANCTIONS**

Your defendants, Regent University and Marion Gordon "Pat" Robertson ("Regent"), by counsel, submit this Motion for Attorneys' Fees and Costs pursuant to 28 U.S.C. § 1927, Federal Rules of Civil Procedure 11 and 54(d), and E.D. Va. Loc. R. 54(D). Plaintiff and his counsel instituted and maintained a baseless, frivolous lawsuit against Regent designed solely to harass Regent and unnecessarily increase its costs in defending this case. Counsel also multiplied the proceedings in this case unreasonably and vexatiously, thereby entitling Regent to an award of attorneys' fees incurred as a result thereof.

WHEREFORE, for the reasons set forth above and more fully described in Regent's Memorandum in Support of its Motion for Attorneys' Fees and/or Costs, filed contemporaneously herewith, Regent respectfully requests that the Court GRANT Regent's Motion and award it fees in the amount of \$58,639.77.

REGENT UNIVERSITY

/s/

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 6th day of July, 2009, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

## **Key**

Adam Key represented by Michael Bruce Hamar Michael B. Hamar PC 520 W 21st St, Suite J Norfolk, VA 23517 (757) 622-2008

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